STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on April 13, 2005

COMMISSIONERS PRESENT:

William M. Flynn, Chairman
Thomas J. Dunleavy
Leonard A. Weiss
Neal N. Galvin

CASE 97-C-0139 – Proceeding on Motion of the Commission to Review Service Quality Standards for Telephone Companies.

ORDER ESTABLISHING MODIFICATIONS TO THE
INTER-CARRIER SERVICE QUALITY GUIDELINES

(Issued and Effective April 15, 2005)

BY THE COMMISSION:

The Inter-Carrier Service Quality Guidelines (C2C Guidelines) is a comprehensive document established for the purpose of measuring inter-carrier service quality performance. Since the adoption of the C2C Guidelines, the Carrier Working Group (CWG) – whose active membership includes Department Staff and many of the incumbent and competitive local exchange carriers (ILECs and CLECs, respectively) operating in New York State – has continued to work in a collaborative manner to propose modifications to the C2C Guidelines. These efforts have been the subject of several previous Commission orders in this proceeding.

In this instance the CWG recommends modifications to the C2C Guidelines that include: edits that are administrative in nature; modifications incorporating audit results from other state C2C proceedings; the creation of a new metric measuring

the completeness of Verizon bills to CLECs; and modifications to the existing measurements of the response time of certain Verizon OSS interfaces, including the creation of two new sub-metrics.

Notice of our intent to modify the C2C Guidelines was published pursuant to the State Administrative Procedure Act (SAPA) in the State Register on January 12, 2005. No comments in response to the SAPA were received.

DISCUSSION

The CWG recommends changes to the C2C Guidelines that either represent the consensus decision of the CWG, i.e., the affected parties have agreed upon the necessity and implementation of the standards and metrics, or which are non-consensus. Prior to making a non-consensus proposal, the CWG endeavors to reach consensus to the extent possible, thereby narrowing the areas of disagreement and the scope of issues requiring analysis and determination by the Commission.

Modifications to the C2C Guidelines adopted in this Order were developed by the consensus determination of the CWG, or based on analysis of issues raised by the parties in their non-consensus filings.[1]

1) Guideline Administrative Changes and the Incorporation of Audit Findings from Other States

The CWG periodically submits for our approval a "consensus package" of proposed C2C Guideline changes that were agreed to by all the active CWG parties. These consensus

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[1] Non-consensus filings were received from AT&T Communications of New York, Inc. (AT&T), Broadview Networks, Bridgecom International, Covad Communications (Covad), Time Warner Telecom (TWTC), Verizon New York Inc. (Verizon), and Metropolitan Telecommunications (MetTel).

changes can be categorized as administrative in nature, i.e.,
they clarify or correct minor clerical errors within the
Guidelines, or they may modify processes defined in the C2C
Guidelines that the CWG parties have agreed are necessary and
should be implemented. The consensus package submitted by the
CWG for approval here is included as Attachment 1.

The consensus package in Attachment 1 also includes
modifications that incorporate certain findings from audits
convened by other state Commissions of Verizon's adherence to
their C2C Guidelines.[2] Parties to those proceedings, including
Verizon, decided to bring audit findings applicable to New York
and other state C2C Guidelines here because modifications to the
New York C2C Guidelines flow through to many other state C2C
proceedings in the Verizon East footprint. To validate the
applicable findings and recommend their incorporation here, a
Joint Subcommittee (JSC) of the CWG was formed and met in
numerous collaborative sessions since June 2004. The C2C
Guideline changes being adopted in this order stemming from the
audit findings reflect only those that achieved the consensus
recommendation of the JSC and were then approved consensually by
the CWG for inclusion in the consensus package submitted.

We adopt the consensus recommendations of the Carrier
Working Group, which include administrative changes and
modifications incorporating audit results from other state C2C
proceedings, as they enhance the C2C Guidelines in monitoring
wholesale telephone service quality performance.

2) BI-9 Billing Completeness

To address concerns regarding the timeliness of back-
billed charges by Verizon, the CWG proposes the creation of a

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[2] The modifications include audit results approved by the
Pennsylvania, New Jersey and Virginia public utility
Commissions.

new metric to measure the completeness of Verizon charges and credits on the Carrier bill of record. The CWG was able to narrow some of the contentious aspects of this metric through its collaborative efforts, reaching consensus on the metric's general definition and product applicability. However, the individual CWG parties submitted varying proposals on the time periods that would be under the metric and the assigned performance standard. In all proposals, the absolute dollar value of charges that accrued within the metric's specified billing cycle period is measured against the absolute value of all charges on the monthly bill.

   a) <u>The Verizon BI-9 Proposal</u>

      Verizon proposes a single measurement of BI-9 Billing Completeness performance which would, for metric purposes, require that billing for accrued charges be 96% complete within 12 (monthly) billing cycles. Verizon proposes this metric in response to CLEC claims that back billing has interfered with their financial obligations and planning, and a CLEC's ability to properly bill its customers. For various reasons, Verizon states that the CLECs' back billing arguments are without merit. Verizon believes that it is the CLECs' responsibility to maintain inventories and accurately bill their customers and that it already provides CLECs all the necessary information for CLECs to do so. In response to the CLEC concerns, however, Verizon originally offered a measurement of billing completeness covering a 24 month-billing cycle period (with a 95% performance standard). After internal discussion and further consideration of the CLECs' concerns, Verizon enhanced its original proposal, reducing the billing cycle period to 12 months and increasing the performance standard to 96%. TWTC is not opposed to Verizon's revised proposal.

      With the exception of TWTC, the majority of CLECs find that Verizon's proposal, which would permit up to 4% of charges

to be unbilled for up to a full year, is unreasonable. They
claim it is unfair to allow 12 months for Verizon to materially
complete its billing while Verizon requires payment by CLECs
within a month of billing. Likewise, they claim it is unfair
for Verizon to obligate CLECs to retain all relevant data to
verify charges that may arise up to a year after accrual. In
response, the CLECs offer counterproposals to the Verizon
measurement.

 b) <u>CLEC Alternative BI-9 Proposals</u>

  There were two CLEC proposals for BI-9 Billing
Completeness: one that would measure completeness of charges
within three billing cycles at a 99% standard, and one that
would have two BI-9 sub-metrics to measure billing completeness
performance over two periods - within three billing cycles at a
95% performance standard and within twelve billing cycles at a
99% performance standard.

  ATT, MCI, Broadview, Bridgecom (in a joint filing) and
Covad (collectively, the Joint CLECs) support a single Billing
Completeness proposal that requires charges be 99% complete in
three billing cycles. The Joint CLECs claim that billing
completeness within a three billing cycle period is commercially
reasonable considering the amount of testing and development of
Verizon's OSS systems over the years. The Joint CLECs believe
Verizon should address the root causes that may degrade its
billing performance and claim that Verizon offers no reasonable
explanation of what would cause untimely billing in excess of 3
billing cycles. The Joint CLECs believe the past propensity for
significant back billing events is due to the lack of metric or
penalty. They further believe that a Billing Completeness
metric of 99% complete in three billing cycles will
encourage Verizon to implement efficiencies that improve its
billing processes for the benefit of wholesale customers, as
well their own retail customers.

MetTel supports a two-tiered Billing Completeness metric as the most commercially rational choice, proposing a measurement of billing completeness within three billing cycles at a 95% performance standard and a measurement within 12 billing cycles at a 99% performance standard. It claims the Verizon proposal is not viable, because 12-month old charges can be the cause of audit and disclosure problems. It believes that after seven years of experience, Verizon should be able to render bills where 95% of accrued charges are billed within three billing cycles (or less) and where the remaining 4% of accrued charges are billed within 3 to 12 billing cycles. MetTel claims that this approach will allow Verizon to bill in a timely manner and allows for a reasonable grace period for extraordinary charges.

Citing the complexity of its billing systems and the wide array of products the system supports, Verizon views any proposal that includes billing cycle periods shorter than 12 months and performance standards of 99% as unreasonable. TWTC agrees that proposals to measure billing completeness in as little as 3 billing cycles or at 99% are not appropriate to address the underlying objective for this metric – to capture and correct major billing errors.

   c) <u>Determination on BI-9 Billing Completeness</u>

We are encouraged that the CWG has taken a collaborative approach to address the concerns raised by the back billing issue. Where the differing proposals offer common language, we approve such as the consensus recommendation of the CWG.

Given the complexity and limitations of Verizon's legacy billing systems, Verizon's 12 billing-cycle proposal is a significant commitment, compared to its initial proposal to the CWG for a 24 billing-cycle period measurement. However, we believe further improvement in timely billing performance is

possible and may be warranted. Without credible data support,
however, it is not possible to evaluate Verizon's ability to
achieve acceptable standards of bill completeness in shorter
billing cycle periods, i.e., three months, as suggested by the
CLECs. Therefore, while we find the objective of the alternate
proposals attractive, we are not convinced that they are
appropriate at this juncture. We shall adopt a new metric to
measure Billing Completeness in 12 billing cycles at a 96%
performance standard, and direct the Carrier Working Group
continue to collaborate on this issue and collect and analyze
data on billing completion intervals for purposes of determining
whether metric refinements, or additional new metrics would help
ensure improvements in wholesale billing timeliness. The CWG
will report back the results of its investigation in the next
submission of C2C Guideline recommendations, or in one year's
time.

        The parties also disagree on how billing adjustments,
i.e., rate changes and rate restructures, resulting from
regulatory action (including but not limited to retroactive
regulatory orders) are to considered timely in the BI-9 Billing
Completeness metric. We determine that the definition of BI-9
should reflect timely completion if regulatory adjustments are
billed within the 12 billing-cycle period required in the BI-9
metric approved here.

3) <u>MR-1 Response time OSS Maintenance Interface</u>

        The MR-1 metric was designed to measure the response
time associated with trouble requests submitted by CLECs in the
OSS Maintenance Interface. The MR-1 metric is divided into sub-
metrics that measure the different trouble transactions,
including Create, Status, Modify, Request Cancellation, Trouble
History Report and Test Trouble. At issue here are several
modifications to the existing MR-1 Response Time OSS Maintenance
Interface sub-metrics to include electronically bonded

interfaces (EBTA and TAXI)[3] and the creation of two new sub-metrics related to the performance of trouble ticket closure notification. After reaching consensus on a number of issues, the CWG parties submitted positions on each of the several unresolved issues to be considered with regard to modifying the MR-1 metric. Discussion and determination of the non-consensus issues is provided below.

a) <u>Measuring Point of the EBTA and TAXI Timestamp</u>

The issue here is the point when measuring begins and ends for requests and responses in an electronically bonded (EBTA or TAXI) OSS Maintenance Interface transaction. The Verizon proposal would measure from the point of entry, after the Verizon OSS firewall, to the point of exit, after the firewall of the Verizon interface application. The CLECs offer different proposals, depending on whether EBTA or TAXI is used, that measure performance from when a trouble message is initially transmitted to when a return message is transmitted by Verizon.

Verizon insists that its timestamp proposal here is consistent with timestamps used in other interfaces and argues that it should not be required to calculate a measure using a timestamp not taken from within its own network. It further claims that the alternative proposal for EBTA is not technically feasible today and existing national standards do not currently accommodate the functionality required by alternative proposal timestamp methodology for both EBTA and TAXI. With regard to the specific MetTel proposal for the TAXI timestamp, which relies on Internet session time, Verizon believes such a method

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[3] Electronic bonding refers to the method of transferring electronic information between CLEC and Verizon OSS interfaces on a machine-to-machine, real time basis. EBTA refers to Electronic Bonding for Trouble Administration, TAXI refers to Trouble Administration xML.

is unreliable and subject to factors outside its control, including the impact of a CLEC's internal network performance. It further states that its established start and stop times on interface transactions have been scrutinized by outside auditors for several years without any determinations that problems exist and enhancements are necessary.

With regard to the timestamp used by the Maintenance interface, MetTel offers a technical discussion in support of the alternative proposals with concurrence from ATT and MCI. Its argument focuses on the inability of CLECs to verify Verizon's reported gateway arrival and departure times. To counter Verizon's claims that it should not be accountable for timestamps from outside its network, the CLECs propose that a Verizon-generated timestamp method be developed to define interface transaction start and stop time. MetTel further proposes a specific method for measuring TAXI transactions that utilizes Internet Information Service (IIS) capability, but which still relies upon Verizon-generated activity to produce the timestamp. Covad raises the point that electronic bonding is not available to all CLECs but would support a metric that is replicable, i.e., can be independently validated by CLECs, regardless of the interface used.

With regard to timestamps, the alternative proposals offer only a generic definition of interface transmission boundaries in the metric's methodology section. Because Verizon's current interface systems do not support the CLEC timestamp proposal, development of a method to accomplish the capturing and reporting of timestamp information would be necessary. Electronically bonded transactions over system-to-system connectivity inherently offer electronic acknowledgement of messages, so significant failures are likely to be noticed without the desired precision of the alternative proposals. It remains uncertain at this juncture whether the cost and effort

necessary to develop the CLECs' proposed timestamp method is justified in terms of the operational need it will address. The alternative proposal for TAXI, which relies on Internet session time, is not a reliable method of measurement, as it relies on factors outside of both Verizon's and the CLECs' control. For these reasons, we adopt Verizon's timestamp proposal proposal for electronically bonded transactions.

b) The Applicability of Measuring and Reporting of EBTA Performance in NY

The existing MR-1 Response Time OSS Maintenance Interface metric for EBTA is applicable only in New Jersey. Verizon recommends no changes to its current reporting obligation, while the alternative CLEC proposal would require reporting of MR-1 performance in other states, including New York.

Verizon claims that no new sub-metrics should be created for MR-1, including the expansion of reporting MR-1 performance outside of New Jersey. It claims that reporting this metric is not necessary and would be to the benefit of only one CLEC. It further states that business relationships exist with other CLEC users of EBTA that govern the responsibilities of Verizon and the users in EBTA transactions. Verizon feels it is not necessary to begin measuring EBTA now when, in fact: existing business-to-business relationships are in place; there are only a limited number of EBTA users; and, Verizon has never received complaints regarding response times by EBTA users.

Reporting of EBTA performance in New York is supported by all CLEC parties. ATT, which uses the EBTA interface, believes that it is both reasonable and practical to implement an EBTA metric in New York. As it points out, EBTA is still the

only mechanized maintenance interface which Verizon considers in "production".[4]

We adopt the alternative CLEC proposal to require reporting of EBTA performance in the MR-1 Response time OSS Maintenance Interface metric in New York. The inclusion of EBTA is consistent with previous efforts of the CWG to facilitate the standardization and consistency of metrics across the Verizon footprint.

c) EBTA and TAXI Performance Standards

The parties offer differing positions with regard to standards assigned to EBTA and TAXI performance in the MR-1 metric.

As Verizon insists that measurement and reporting of EBTA performance is not necessary in New York, it offers no performance standard. For the TAXI system, Verizon proposes that performance be reported diagnostically, i.e., without a standard, until there are three active CLECs using the TAXI system. Consistent with its argument to prohibit reporting of EBTA in New York, it feels it is inappropriate to report the performance on, predominantly, one CLEC's activity. After three or more CLECs are using the system, Verizon would support a performance standard of 95% within 2 minutes.

The alternative CLEC proposal recommends an absolute performance standard of 95% within two minutes for both the EBTA and TAXI interfaces. TWTC believes consistent standards for both EBTA and TAXI are desirable. Covad states that a parity measurement (utilized for other non-electronically bonded interfaces and for EBTA in New Jersey) is not appropriate here

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[4] According to Verizon, the other maintenance interface, TAXI, is still in Beta testing and is not in "production" for general use.

without the ability to replicate the validity of Verizon's retail measurement.

It is reasonable that EBTA and TAXI response time performance be measured consistently, as the alternative CLEC proposal recommends. Therefore, we adopt a performance standard of 95% within two minutes for both EBTA and TAXI in the MR-1 metric, and require that reporting of TAXI performance commence immediately.

d) MR-1-07 % On-Time Ticket Closure on Bonded Open Tickets by Verizon

The CLECs support an alternative proposal to establish a new sub-metric in MR-1 to measure on-time trouble ticket closure. The MR-1-07 sub-metric would measure whether closure notification was received on the date the ticket was closed and includes a performance standard of 99.5%.

Verizon objects to the proposed establishment of the MR-1-07 sub-metric. It argues that MR-1-07 is not an interface response time measurement, which is the purpose of the MR-1 sub-metrics. Verizon believes that the CLECs have not demonstrated the necessity for a timeliness measure for ticket closure of bonded open tickets, and states that it is not aware of complaints on the receipt of closure notification in EBTA or TAXI. Further, it states that the trouble ticket closure notification process does not restrict CLECs from conducting their operations. Verizon also claims that it currently has no ability to capture information regarding when a closure notification was received by a CLEC, nor would it be cost effective to develop such functionality. Lastly, it claims that the alternative CLEC proposal would not allow for notification rejection by a CLEC.

Certain CLECs offer several reasons in support of the alternative proposal for the MR-1-07 metric. ATT believes that the purpose of electronic bonding is to mechanize the process to

achieve lower costs, faster response and eliminate human interface errors. It raises concerns regarding the work required and cost associated with manually intervening to close a ticket when Verizon systems fail to generate a timely ticket closure. MetTel believes that it is critically important to CLEC customer service quality that closure notification for bonded tickets be timely.

We agree that timely notification of ticket closure on bonded open tickets is a reasonable expectation of CLECs using electronic bonded systems. However, we are not convinced that a performance standard of 99.5% is appropriate or reasonable even in an electronic system. Therefore, we will adopt the alternative proposal for MR-1-07 % On-Time Ticket Closure on Bonded Open Tickets with a standard of 98%.

e) MR-1-08 % On-Time Ticket Clear to Close

An alternative proposal by the CLECs is the establishment of a MR-1 sub-metric to measure the interval between cleared ticket (repair complete) notification and ticket closure (ticket process complete) notification. The alternative proposal for MR-1-08 would measure the performance of ticket closure notification within 12 hours of when the ticket was determined "cleared" and assigns a performance standard of 99.5%.

Verizon objects to the alternative proposal to establish the MR-1-08 sub-metric. It believes the proposal is not reasonable for several reasons. It claims that it has not received complaints regarding the timeliness of electronic clear to close notification for TAXI or EBTA. Further, it states that establishment of the MR-1-08 measurement would prohibit a CLEC from initiating ticket resolution options available once a trouble ticket is cleared, such as CLEC verification of trouble

clearance. Verizon further claims that development of the alternative MR-1-08 proposal would be extremely complex.

ATT and MetTel support the establishment of MR-1-08% On-Time Ticket Clear to Close with a 99.5% standard within 12 hours. MetTel claims that measurement of the interval between trouble cleared and ticket closure notification is critical in electronically bonded environments because Verizon closes repair tickets unilaterally in EBTA and TAXI systems and that is essential that CLECs are advised as quickly as possible that troubles are cleared and tickets are closed. TWTC and Covad object to the proposed MR-1-08 metric as it may limit their ability to monitor tickets after troubles are cleared.

Based on the vastly differing positions of the CWG on the establishment of MR-1-08 % On-Time Ticket Clear, it is apparent that this proposal has not been fully developed. In its current state, the proposed metric would place limitations on a CLEC's ability to verify trouble clearance for certain products and the associated performance standard (99.5%) is an unreasonable expectation of Verizon's ability to achieve such a metric. Therefore, we do not adopt the alternative proposal to establish MR-1-08 % On-Time Ticket Clear.

<div align="center">CONCLUSION</div>

The Commission approves the revisions to the Inter-Carrier Service Quality Guidelines that, as discussed herein, incorporate: administrative changes; audit findings from other State C2C proceedings; the establishment of a Billing Completeness sub-metric; and modifications to the Response Time OSS Maintenance Interface metrics.

CASE 97-C-0139

<u>The Commission orders</u>:

      1. The consensus recommendations of the CWG are adopted and the non-consensus proposals on metrics and standards as discussed in this Order are adopted consistent with our determinations set forth above.

      2. Within 15 days of the date this Order is issued, Verizon New York Inc. shall file with the Secretary (20 copies) and serve upon each party the ordered corrections, changes and additions to the Inter-Carrier Service Quality Guidelines.

      3. This proceeding is continued.

By the Commission,

(SIGNED)   JACLYN A. BRILLING
                              Secretary

Miscellaneous.

1. *Change Proposed*:

Add a page/table to indicate the implementation process for the East Guidelines in East states.   Suggested language appears below.

State	Compliance Filing Due Date
NY, CT	15 calendar days after order issue date
MA	10 calendar days after NY filing
NH	20 calendar days after NY filing
RI, ME and VT	30 calendar days after NY filing
NJ, DE, MD*, VA, WV	30 calendar days after NY filing
PA	30 calendar days after NY filing
DC	30 calendar days after NY filing

Rationale:
> Language clarification. While the North states normally adopt NY changes in the same data month as NY, the South states follow a separate adoption process. Therefore, the footer in the East guidelines which specifies the effective month is not accurate for the South states. A table will help to clarify the adoption process.

Misc.	URL Reference Table	PO-3-02

2. *Change Proposed*:

Update the 1st entry in the URL table for major holidays to include PO-3-02.

Rationale:

Language clarification. Related to Liberty MD, DC and VA Findings #13 (all states same finding #). Item discussed during PO JSC item and marked as **consensus at the 12/21/04 JSC meeting.**

Misc.	General Exclusions	

3. Change Proposed:

Add clarification to the General Exclusions Section for Verizon Official Services. Updated language appears as follows:

Verizon Official Services

Verizon official (administrative) lines are lines used by Verizon employees or contractors to conduct official company business.

Rationale:

Language clarification. Related to Liberty NJ Finding #101. Item discussed during NP/BI JSC and marked as **consensus at the 2/15/05 JSC meeting.**

Consensus Section A - Administrative Changes to C2C Guidelines

PO-1	Response Time OSS Pre-Ordering Interface	Products: All

4. *Change Proposed*:

Change the metric title for the PO-1-09 sub-metric to be consistent with PO-1 metrics. Updated language appears in bold or strike-through text below.

PO-1-09 metric title: **Average Response Time -** Parsed CSR

Rationale:

The existing metric title is not consistent with the other PO-1 Average Response Time metrics and is not an accurate representation of the PO-1-09 metric. The metric actually measures the Average Response Time of the Parsed CSR transaction. **Consensus 1/13/2005**

PO-2	OSS Interface Availability	Products: All *except WPTS*

5. *Change Proposed*:

Update the Exclusion section. Update the 1st exclusion to reference interfaces instead of systems. Update the 3rd exclusion to reference Scheduled interface downtime. Updated language appears in bold and/or strikethrough text below:

Troubles reported but not found in VZ's ~~systems~~ **interfaces**
Scheduled interface ~~outages~~ **downtime** for major system releases……..

Rationale:

Language clarification. Not related to an audit finding; however, this item was discussed and marked as **consensus at the 9/23/04 PO JSC meeting.** .

PO-2 continued

6. *Change Proposed*:

Change the Geography section to reflect the geographical reports specifications for the PO-2 sub-metrics. Updated language appears in bold or strike-through text below.

Geography:

All products except WPTS
- ~~Verizon North: NY, CT, MA, NH, RI, VT & ME~~
- ~~Verizon Mid-Atlantic: PA, DE, NJ, DC, MD, VA, WV~~
- **NY, CT**
- **MA, VT, RI, NH, ME**
- **PA, DE**
- **NJ**
- **MD, VA, WV, DC**

WPTS:
- Verizon National

Rationale:

The existing geography listed is not an accurate representation of the performance results reported on the state C2C performance reports. **Consensus 1/13/2005**

7. *Change Proposed*:

Update the 1st bullet in the Products section. Ensure that LSI/W is referenced consistent with remaining PO-2 documentation and guidelines. Updated language appears in bold or strikethrough text below:

Maintenance **~~Web GUI~~** (RETAS) / Pre-Ordering/Ordering Web GUI **(LSI/W)**

Rationale:

Language clarification. Not related to an audit finding; however, this item was discussed and marked as **consensus at the 9/23/04 PO JSC meeting.** .

PO-3	Contact Center Availability	Products: Ordering calls

8. *Change Proposed*:

Update the Performance Standard section to reference the Ordering center using correct terminology and indicate that the Ordering center observes major holidays. Updated language appears in bold or strikethrough text below:

Repair Help Desk: 24 hours per day – seven (7) days a week
National Market Center (Ordering) ~~Order Processing Assistance~~: 8:00AM to 6:00PM Monday through Friday**, excluding major holidays**.

Refer to the URL matrix at the beginning of the C2C guidelines to obtain the URL that provides the various center hours of operation schedules. After accessing the web-site, select a center to receive center-specific information. **Also refer to the URL matrix at the beginning of the C2C guidelines for the current year's holiday schedule in effect at the time of the compliance filing. The information contained on the URL identifies the actual date the holiday is observed.**

Rationale:

Language clarification. Resolves Liberty audit findings MD 13, DC 13 and VA 13. **Consensus item per 12/21/04 JSC meeting.**

PO-4	Timeliness of Change Management Notice

9. *Change Proposed*:

Update the Definition section. Add a sentence to the end of the paragraph to clarify that PO-4-01 measures percentage, while PO-4-02 and PO-4-03 measure delay days. Also update to clarify the type of notifications included in the PO-4 calculations. Updated language appears in bold or strikethrough text below:

…..within prescribed timeframes. **Sub-metrics PO-4-02 and PO-4-03 measure the amount of cumulative delay days (as documented in the sub-metric) for Change Management notices sent. Change Management notices are notices sent to the CLECs to notify CLECs of scheduled interface software-affecting changes with a "Type" designation (Type 1, 2, 3, 4, 5).**

Rationale:

Language clarification. Resolves Liberty audit findings NJ 18, VA 14 and MD 14 and PA Recommendation #1, Finding III-B-4. **Consensus items per 9/23 (PA item), and 11/23/04 JSC meetings (NJ, VA and MD).**

PO-4, continued

10. *Change Proposed*:

> Update the PO-4-02 sub-metric title to remove the % sign from the beginning of the title. Updated language appears in bold/strikethrough text below:

> ~~%~~ Change Management Notice – Delay one (1) to seven (7) days

Rationale:

> Language clarification. Resolves PA Recommendation #1, Finding III-B-4.
> **Consensus items per 9/23 JSC meeting**

PO-5	Average Notification of Interface Outage

11. *Change Proposed*:

> Update the 1st sentence of the Definition section and a paragraph to the end of the section to clarify the purpose of the metric. Updated language appears in bold or strikethrough text below:

> This metric measures the ~~**average**~~ amount of time…..

> ….CLEC handbook.

> **For the purpose of this measure, scheduled interface downtime where CLECs were provided with advanced notification (> 24 hours) of the downtime in compliance with Verizon Change Management Guidelines is not considered an outage.**

Rationale:

> Language clarification; aligns PO-2 exclusions with PO-5. Resolves Liberty audit findings NJ 20, VA 16 and MD 16. **Consensus items 11/23/04 JSC meetings.**

12. *Change Proposed*:

> Update the Exclusions section to clarify items excluded from PO-5 calculations. Updated language appears in bold or strikethrough text below:

> - ~~None.~~ **Troubles reported by a CLEC that were not reported to Verizon's designated trouble reporting center, which is the WCCC.**
> - **Outages exclusively identified at month-end EnView reconciliation process.**

Rationale:

> Language clarification; aligns PO-2 exclusions with PO-5. Resolves Liberty audit findings NJ 20, VA 16 and MD 16. **Consensus items 11/23/04 JSC meetings.**

PO-6	Software Validation

13. *Change Proposed*:

Update the Definition section to clarify the metric applies to the three major CLEC-impacting software releases where Verizon offers a test deck in the CLEC Test Environment (CTE). Updated language appears in bold or strikethrough language below:

This metric measures software validation **for CLEC-affecting major releases where Verizon offers a test deck in the CLEC Test Environment (CTE).** Verizon installs **CLEC impacting major** software releases………

Rationale:

Language clarification. Resolves Liberty audit findings NJ 25, VA 19and MD 19. **Consensus items 9/23/04 JSC meeting.**

PO-8	Manual Loop Qualification

14. *Change Proposed*:

Update the Definition section to clarify the metric includes all manual loop qualification requests. Updated language appears in bold or strikethrough language below:

….when such information is ~~**not available through an electronic database**~~ **requested through an available interface.**

Rationale:

Language clarification. Resolves Liberty audit findings NJ 29, VA 24, and MD 24. **Consensus items from 9/23/04 JSC meeting.**

OR-1	Order Confirmation Timeliness	**Products**: UNE

15. *Change Proposed*:
> Update the language in the UNE performance standard section to include LNP
> and UNE Platform for Electronically Submitted Orders. Updated language in
> bold text as follows:

Electronically Submitted Orders:

POTS/Pre-Qualified Complex**/LNP and Platform**:

- Flow-Through Orders: two (2) hours
- Orders with no facility check: 24 hours
- Orders with facility check: 72 hours

Rationale:
> Language Clarification. The performance standard section was not consistent
> with the product listings for the OR-1 metrics. **Consensus 1/13/2005**

OR-2	Reject Timeliness	**Products**: All as applicable

16. *Change Proposed*:
> Update the RPON language in the Definition section to correct typographical
> error. Updated language appears in bold or strikethrough text as follows:

When a CLEC designates RPONs, the **FOC/LSRC** time stamp used for receipt of all
RPONs is the date/time the last RPON is received. The ~~**FOC/LSC**~~ **reject/query** returned
date/time would be the actual returned date/time of each RPON.

Rationale:
> Typographical Correction/Language Clarification. The OR-2 metrics measure
> reject timeliness not FOCs. The language above is documented in the NY PSC
> 10/29/03 order but was mistyped in the compliance filing. The language change
> above makes the document consistent with the NY 10/29/2003 order. **Consensus
> 1/13/2005**

OR-2 continued,

17. *Change Proposed*:
Update the language in the Resale and UNE Electronically Submitted Orders performance standard section to include Pre-Qualified Complex for Resale and Pre-Qualified Complex/LNP and UNE Platform for UNE. Updated language in bold text as follows:

Resale:	UNE:
Electronically Submitted Orders*:*	**Electronically Submitted Orders:**
POTS**/Pre-Qualified Complex**: • Flow-Through Orders: two (2) hours • Orders with no facility check: 24 hours • Orders with facility check: 72 hours	POTS**/Pre-Qualified Complex/LNP & Platform***:* • Flow-Through Orders: two (2) hours • Orders with no facility check: 24 hours • Orders with facility check: 72 hours

Rationale:
Language Clarification. The performance standard section was not consistent with the product listings for the OR-2 metrics. **Consensus 1/13/2005**

OR-5	**Percent Flow-Through**	**Products**: All

18. *Change Proposed*:
Update the language in the performance standard section. Updated language as follows:

OR-5-01: No standard ~~developed for total flow-through.~~
OR-5-03: 95% ~~for % flow-through achieved~~

Rationale:
Elimination of superfluous language, improves readability. **Consensus 1/13/2005**

OR-7	% Order Confirmation/Rejects Sent Within Three (3) Business Days	**Products**: All

19. Change Proposed:

> Update the language in the definition section pertaining to related purchase order numbers (RPONs). Updated language as follows:

Related PONs: When a CLEC designates RPONs, the FOC/LSRC time-stamp used for receipt of all RPONs is the date/time the last RPON is received. The FOC/LSC **and/or reject/query** returned date/time would be the actual returned date/time of each RPON.

Rationale:

> Clarification of language. OR-7 measures order confirmations and/or rejections. The language in the NY PSC 10/29/03 order specified only rejects and was not entirely accurate. The updated language above is in consistent with OR-7 definition. **Consensus 1/13/2005**

OR-11	Timeliness of Loss of Line Report	**Products**: All

20. Change Proposed:

> Update all appearances of OR-11 Loss of Line in the C2C Guidelines to reflect name change of Loss of Line report to Provider Notification Report. This includes updates to the Index table, the Category Function metrics tables, and changes within the OR-11 section itself including the heading, Definition section, numerator and denominator.

> 19 a) Updated language to the OR-11 section heading appears in bold or strike-through text below: **Consensus 1/13/2005**

Function:

OR-11 Timeliness of ~~Loss of Line~~ **Provider Notification** Report

> 19 b) Updated language to the OR-11 **Definition** section appears in bold or strike-through text below. **Consensus 1/13/2005**

Definition:

The number of transmission days from the effective date of the line loss to the date that the notification information is made available to the CLEC on the **Provider Notification (PN)** ~~Loss of Line (LOL)~~ Report. ……………Inaccurate and missing notices are considered late. **PN** ~~Loss of Line~~ Reports will be provided to CLECs ………….. The **PN** ~~LOL~~ process starts at 6:00 PM with collection of "D" information from the SOP. Information is then held from two (2) to five (5) days for a matching "N" order prior to being included in a **PN** ~~Loss of Line~~ Report. Non-transmission day and holiday **PN** ~~LOL~~ is reported on the next transmission day.   **PN** ~~LOL~~ for CLECs is reported at the same time as Verizon's.

Note:
Verizon offers its CLEC customers the option of receiving **PN** ~~LOL~~ Reports through the Network Data Mover (NDM) /Connect Direct, EDI, and FTP File Server processes….

Consensus Section A - Administrative Changes to C2C Guidelines

OR-11 continued

19 c) Updated language to the OR-11 **sub-metric title** appears in bold or strike-through text below. Also reversing UNE-P in title to be consistent with the order in which product listings appear. **Consensus 1/13/2005**

OR-11-01: %~~UNE-P/~~Resale**/UNE-P** ~~Line Loss~~ **Provider Notifications** in Days

19 d) Updated language to the OR-11 **Numerator and Denominators** appear in bold or strike-through text below. **Consensus 1/13/2005**

Numerator	Denominator
Number of accurate loss notices sent on daily **PN** ~~LOL~~ reports processed during month, …..	Number of Loss Records on **PN** ~~LOL~~ Reports…..

Rationale:

Clarification. The Loss of Line Report is now referred to as the Provider Notification Report. **Consensus 1/13/2005**

21. *Change Proposed*:

Update the Product listing to be consistent with metric-title ordered in NY PSC 10/29/03 and to be consistent with contents of report. Updated language appears in bold text below.

Products: **~~Resale   UNE~~**   **Resale/UNE-P combined**

Rationale:

Clarification. The PN Report contains Resale/UNE-P combined. **Consensus 1/13/2005**

PR-6	Installation Quality

22. *Change Proposed*:

Update the Definition section. Change the systems referenced in the Note to more generic language. Updated language appears in bold or strikethrough below.

Disposition Code 05 includes translation troubles automatically cleared via **Switch To Order Compare (STORC)** for Verizon North and SERVICE for Verizon Mid-Atlantic **(or other similar record verification system utilized by Verizon)** ~~STARMEM for Verizon North and SERVICE for Verizon Mid-Atlantic)~~ by CLEC.

Rationale:

Clarification. STARMEM is retiring and being replaced with another system. Removing system name reference**.**

MR-2	Trouble Report Rate

23. *Change Proposed*:

Update the Definition section. Add a statement to clarify that troubles are counted in the month the trouble is closed.

Troubles are reported in the month the trouble ticket is closed.

Rationale:

Clarification. Language resolves Liberty MD finding #77 bullet #1 and VA finding #78 bullet #1. **Consensus per 12/9/04 MR JSC meeting.**

24. *Change Proposed*:

Update the MR-2 Exclusion section to a) clarify Report Rate exclusion does not apply to MR-2-04 b) update the Total and Loop/CO report rate exclusion to add NPC and CC and c) add Line Splitting to the MR-2-02 and MR-2-03 exclusion. Updated language appears in bold text below.

a. **Except for MR-2-04:** Report rate excludes subsequent reports (additional customer calls while the trouble is pending.)

b. Excluded from Total and Loop/CO report rates:
   - Customer Premises Equipment (CPE) troubles
   - Troubles reported but not found (Found OK**, and** Test OK**, Non-Plant Classified (NPC) and Came Clear (CC))**

c. Excluded from MR-2-02 and MR-2-03 for 2-Wire xDSL Loops and 2-Wire xDSL Line Sharing **and 2-Wire xDSL Line Splitting**: Installation troubles

Rationale:

Clarification. Language resolves Pennsylvania audit findings: VZ-12, and VZ-23 items a and b and Liberty MD 80 and 81 findings and VA 80 and 81 findings for item c. **Consensus per the 11/23//04 MR JSC meeting for items a and b and Consensus from the 12/9/04 meeting for item c.**

MR-2 continued
25. *Change Proposed*:
> Update the Performance Standard section to add Non-Plant Classified and Came Clear to MR-2-05 metric title. Updated language appears in bold language:
>
> MR-2-05, %CPE/TOK/FOK**/NPC/CC** Reports: (Customer Premises Equipment, Test OK, Found OK**, Non-Plant Classified and Came Clear).**

Rationale:
> Clarification. Language resolves Pennsylvania audit findings: VZ-13, and VZ-24 and Liberty Virginia #82 and Maryland 82. **Consensus per the 11/23/04 MR JSC meeting.**

26. *Change Proposed*:
> Update the MR-2-04 sub-metric title to clarify the metric. Updated language appears in bold, strike-through text below.
>
> MR-2-04: % Subsequent Reports **as Percent of Total Reports**

Rationale:
> Clarification. Language resolves Pennsylvania audit findings: VZ-12, and VZ-23. **Consensus per the 11/23/04 MR JSC meeting.**

27. *Change Proposed*:
> Remove the MR-2-04 definition from after the metric title. This is duplicate information. Updated language appears in strikethrough text below.

MR-2-04	% Subsequent Reports
~~Description~~	~~Subsequent Reports: Additional customer trouble calls received while an existing trouble report is pending. Subsequents are typically status inquiries or customers calling to change information.~~

Rationale:
> Clarification. Language resolves Pennsylvania audit findings: VZ-12, and VZ-23. **Consensus per the 11/23/04 MR JSC meeting.**

MR-2 continued

28. *Change Proposed*:

Update the MR-2-04 numerator and denominator to remove the reference to FAC, CO and STN. The trouble codes are only applicable to Specials and Trunks; neither of which are reported in MR-2-04. Update language appears in bold, strike-through text below.

Numerator: …..for Disposition Codes 03, 04, and 05~~, **FAC, CO and STN**~~**).**

Denominator: Number of Total Disposition Codes 03, 04, and 05~~, **FAC, CO and STN**~~ troubles reported (per MR-2-01).

Rationale:

Clarification. Specials and Trunks are not reported in MR-2-04. **Consensus 1/13/2005**

29. *Change Proposed*:

Update the MR-2-04 numerator and denominator to remove reference to administrative repeaters (numerator) and to remove reference to MR2-01 (denominator).

Numerator: …..Number of subsequent reports (~~**Field and administrative repeaters for**~~ Disposition Codes 03, 04, and 05).

Denominator: Number of Total Disposition Codes 03, 04, and 05 troubles reported ~~**(per MR-2-01).**~~

Rationale:

Clarification. Resolves Liberty MD Finding #77, bullet 2 and bullet 9 and VA Finding #78 bullet 2, and bullet 9. **Consensus per 12/9/04 MR JSC meeting.**

Consensus Section A - Administrative Changes to C2C Guidelines

MR-2 continued
30. *Change Proposed*:
>Update the MR-2-05 sub-metric title to add Non-Plant Classified and Came Clear to MR-2-05 metric title. Updated language appears in bold language:

>MR-2-05, %CPE/TOK/FOK**NPC/CC** Trouble Report Rate

Rationale:
>Clarification. Language resolves Pennsylvania audit findings: VZ-13, and VZ-24 and Liberty Virginia #82 and Maryland 82. **Consensus per the 11/23/04 MR JSC meeting.**

31. *Change Proposed*:
>Remove the MR-2-05 definition from after the metric title. This is duplicate information. Updated language appears in strikethrough text below.

MR-2-05	% CPE/TOK/FOK/NPC/CC Trouble Report Rate
~~Description~~	~~Troubles closed to CPE, Found OK and Test OK as a percent of lines in service~~

Rationale:
>Clarification. Language resolves Pennsylvania audit findings: VZ-13, and VZ-24 and Liberty VA 82 and MD 82. **Consensus per the 11/23/04 MR JSC meeting.**

32. *Change Proposed*:
>Update the MR-2-05 numerator to reflect additional codes used for Special Services.   Updated language appears in strikethrough text below.

>Numerator: Number of all CPE (Disposition Codes 12/13), Test OK, and Found OK troubles (Disposition Codes 07, 08 and 09), and No Trouble Found (NTF)**, Came Clear (CC) and Non Plant Classified (NPC)** for Specials.

Rationale:
>Clarification. Language resolves Pennsylvania audit findings: VZ-13, and VZ-24, and Liberty VA #82 and MD #82. **Consensus per the 11/23/04 MR JSC meeting.**

MR-3	Missed Repair Appointments

33. *Change Proposed*:
>Update the Definition section. Add a statement to clarify that troubles are counted in the month the trouble is closed.

>**Troubles are reported in the month the trouble ticket is closed.**

Rationale:
>Clarification. Language resolves Liberty MD finding #77 bullet #1 and VA finding #78 bullet #1. **Consensus per 12/9/04 MR JSC meeting.**

MR-4	Trouble Duration Intervals

34. *Change Proposed*:

Update the Definition section. Add a statement to clarify that troubles are counted in the month the trouble is closed.

Troubles are reported in the month the trouble ticket is closed.

Rationale:

Clarification. Language resolves Liberty MD finding #77 bullet #1 and VA finding #78 bullet #1. **Consensus per 12/9/04 MR JSC meeting.**

MR-5	Repeat Trouble Reports

35. *Change Proposed*:

Update the Definition section to clarify that MR-5 measures closed troubles and add FAC, CO and STN language in to be consistent with MR-5-01 calculation. . Updated language in bold / strike-through text below.

This metric measures the percent of troubles ~~cleared~~ **closed** that have an additional trouble ~~reported/cleared~~ **closed** within 30 days for which a network trouble (Disposition Codes 03, 04, or 05, **FAC, CO, and STN**) …….

Rationale:

Clarification. **Consensus 1/13/2005**

36. *Change Proposed*:

Update the Definition section. Add a statement to clarify that troubles are counted in the month the trouble is closed.

Troubles are reported in the month the trouble ticket is closed.

Rationale:

Clarification. Language resolves Liberty MD finding #77 bullet #1 and VA finding #78 bullet #1. **Consensus per 12/9/04 MR JSC meeting.**

NP-1	**Percent Final Trunk Group Blockage**

37. *Change Proposed*:

> Update the Exclusions section to document the NP-1 electronic notification process agreed upon in the JSC. Updated language appears in bold or strikethrough text below.
>
> ~~VZ~~ **Verizon** will electronically notify CLECs (operational trunk staffs) of the following situations for blocked trunks. ~~This~~ **The** notification **states** ~~will identify~~ that ~~VZ~~ **Verizon has** identified a blocked trunk group **due to CLEC reasons,** and that the trunk group **will be** ~~should be~~ excluded from ~~VZ~~ **Verizon** performance. **Verizon will make the exclusion automatically** ~~U~~**unless** the CLEC responds back **within two business days from the date the email notification was sent** with **valid** documentation that the information ~~on the condition is inaccurate~~ **presented by Verizon for the trunk group blockage is inaccurate.** ~~., the trunk group will be excluded:~~

Rationale:

> Language clarification to address PA DCI Finding III-B-2 (VZ#5). JSC **Consensus 12/09/04.**

38. *Change Proposed:*

> Update the Definition section to clarify the final trunk groups included in the NP-1 measure. The updated language appears in bold text below.
>
> **These sub-metrics measure** ~~the~~ -percent of **dedicated one-way** Final Trunk Groups **(FTGs) carrying traffic from Verizon's tandem to the CLEC** that exceed blocking design threshold.
>
> Update the Exclusion section. Remove the first three lines and place them in the Definition section.

Rationale:

> Language clarification. Rather than list trunk groups that are excluded, Verizon will list the trunk groups the metric was intended to measure. Related to Liberty NJ Finding #93. Item discussed during NP/BI JSC and marked as **consensus at the 2/15/05 JSC meeting.**

NP-1 continued

39. *Change Proposed:*

Update the Definition section to clarify that the denominator for NP-1-01 and NP-1-02 includes all final trunk groups provisioned per the CLECs request regardless of whether or not the CLEC utilizes the trunk group. Updated language appears in bold text below.

The NP-1-01 and NP-1-02 sub-metrics include all FTGs provisioned per CLEC request regardless of whether or not the CLEC utilizes the FTG.

Rationale:

Language clarification. If the CLEC requested a final trunk group and it meets the criteria for the NP-1 metric, then it is included in the calculations. It is out of Verizon's control whether or not the CLEC utilizes the trunk group. Related to Liberty NJ Finding #94 and MD #90. Item discussed during NP/BI JSC and marked as **consensus at the 2/15/05 JSC meeting.**

40. *Change Proposed:*

Update the NP-1-02 metric title to clarify that the metric does not follow the Exclusions section. Updated language appears in bold text below:

NP-1-02: % Final Trunk Groups Exceeding Blocking Standard (No **Exclusions** ~~Exceptions~~)

Rationale:

The NP-1-02 metric title states No Exceptions. Per discussion at 8/5/04 JSC NP-1 meeting, group agreed to change to No Exclusions. Related to Liberty NJ Finding #93 and MD #89. Item discussed during NP/BI JSC and marked as **consensus at the 2/15/05 JSC meeting.**

NP-2	Collocation

41. *Change Proposed*:

Update the Definition section to clarify the first sentence regarding collocation arrangements ordered via both the state and federal tariffs. Only virtual collocation arrangements can be ordered via the federal tariff. Updated language appears in bold text below. Also update the definition section to clarify the types of collocation arrangements included in the NP-2 sub-metric.

This metric includes **physical and virtual** collocation arrangement **products** ordered **and provisioned** via ~~both~~ the state ~~and federal~~ tariff**s and virtual collocation arrangement products ordered and provisioned via the federal tariff. Products ordered include new arrangements and augments to existing arrangements where Verizon is required to perform work to add capacity for space, cable termination or DC power.**

Rationale:

Language clarification to address Liberty Audit Findings NJ 96, VA 91 and MD 92, and PA DCI Appe. E, Sec C NP-2 Finding #3. Physical collocation arrangements are no longer part of the federal tariff for new and augment applications. Physical collocation can only be ordered out of the state tariff. **Consensus per 11/16/04 NP-2 JSC meeting.**

NP-2 continued

42. *Change Proposed*:

Update Appendix P to include a milestone for the 76 day arrangements.

Rationale:

Existing appendix only includes 45 day information. Appendix will include a footnote to indicate that the appendix is informational only and the tariff contains in-effect information. This item is not associated with an audit finding but was requested by a CLEC at 10/19/04 JSC meeting and **Consensus from 11/16/04 JSC meeting.**

43. *Change Proposed*:

Update the Interval paragraph to clarify that when Verizon negotiates shorter or longer intervals with the CLECs, Verizon measures against the negotiated interval. Also add language to clarify that Verizon excludes time when a CLEC delays a collocation installation on a stop clock basis.

Updated language appears in bold text below:

Interval: The average number of business days between order application date and completion or between order application date and response (notification of space availability) date. **If a CLEC delays the collocation installation, the collocation interval is extended by the same number of days as the CLEC-caused delay.**

The application date is the date that a valid service request is received. A valid service request is a service request that was populated in accordance with the collocation application instructions found in the URL matrix listed at the beginning of the C2C guidelines.

Verizon and the CLECs may negotiate shorter or longer intervals after Verizon completes an initial space assessment and determination of the collocation request. In these cases, the NP-2 % On-time sub-metrics measure whether or not Verizon met the negotiated due date. The negotiated due date is documented on the initial response form. If Verizon is not able to provide a due date on the initial response form because space is not immediately available to accommodate the CLEC request, but space is pending, rather than reject the CLEC request (because no space is immediately available) Verizon will provide a negotiated due date on a subsequent letter to the CLEC.

NP-2 continued
Change #43 Rationale:

>Language clarifications as noted below to address Liberty Audit Findings NJ 96, VA 91 and MD 92. **Consensus per 10/19 and 11/16/04 NP-2 JSC meetings**

1. If CLEC work needs to be completed before Verizon can complete a collocation arrangement, the Verizon interval is put in a "time-out" status and resumes after the CLEC work is completed. **Consensus per 10/19/04 NP-2 JSC meeting.**
2. On occasions Verizon negotiates a shorter or longer interval with CLECs. In these cases, Verizon measures itself against the negotiated due date documented on either the initial response form or subsequent letters to CLEC. **Consensus per 11/16/04 NP-2 JSC meeting.**

44. *Change Proposed*:

>Update the Formula section to be consistent with remainder of C2C guidelines. Updated changes appear in bold or strike-through text below.

Interval:~~∑ (Committed DD)~~ **Completed arrangement** minus the Application Date) divided by the Number of Arrangements **Completed**.

% On Time: Number of Arrangements completed on DD (adjusted for milestone misses) divided by Number of Arrangements completed multiplied by 100.

Delay Days: ~~÷~~∑ (Actual Completion Date minus the Committed DD (adjusted for milestone misses)) divided by the Number of Arrangements where DD is missed.

Milestone misses**: The** Milestone timeline **is** attached in the **A**~~a~~ppendix **P**.

Rationale:

>Language clarification requested by PA staff at NP-2 JSC meeting. This is an administrative change only and is not the result of an audit finding. **Consensus per 11/16/04 NP-2 JSC meeting.**

BI-3	Billing Accuracy and Claims Processing

45. *Change Proposed*:

>Update the BI-3-08 sub-metric title to be consistent with changes made to the numerator and denominator per the NY PSC 8/27/04 order. Updated language appears in bold or strikethrough text as follows:
>
>% CLEC Billing Claim ~~Credits~~ **Adjustments** ~~Not~~ Appearing on the Bill within 45 days.

Rationale:

>Language clarification. The NY PSC 8/27/04 order updated the numerator/denominator language to reflect that the BI-3-08 sub-metric measures adjustments that are resolved and appear on an invoice in 45 or less days from the resolution date. This change ensures consistency between the metric title and the numerator/denominator. **Consensus 1/13/2005**

BI-6	Completeness of Usage Charges	Products: All
BI-7	Completeness of Fractional Recurring Charges	
BI-8	Non-Recurring Charge Completeness	

46. *Change Proposed:*

Add clarification to the Guideline Definition Section. Updated language appears in underline text as follows:

BI-6: This measure captures the completeness of VZ usage charges and VZ usage billing errors that are itemized by date on the carrier bill <u>of record</u>.

BI-7: This measure captures the completeness of VZ fractional recurring charges shown on the carrier bill <u>of record</u>.

BI-8: This measure captures the completeness of VZ non-recurring charges shown on the carrier bill <u>of record</u>.

Rationale:

Language clarification. Related to Liberty NJ Finding #101. Item discussed during NP/BI JSC and marked as **consensus at the 2/15/05 JSC meeting. NOTE: These metrics are applicable to PA and NJ only.**

GE-4 & GE-5	Directory Listing Verification Reports* (*Applicable to PA Only) Timely and Accurate Provisioning of White Page Directory Listings LSRs and DSRs* (*Applicable to PA Only)

47. *Change Proposed*:

Change the numbering of the GE-4 and GE-5 metrics to GE-5 and GE-6. This change is made for all appearances in the Verizon East guidelines.

GE-4 changes to GE-5
GE-5 changes to GE-6

Rationale:

The GE-4 metric is used in Verizon West. This language change is necessary to eliminate a situation where duplicate numbering schemes exist with different metric definitions. **Consensus 1/13/2005**

Appendix C	EnView Additional Details

48. *Change Proposed*:

Update language in Appendix C of the Guidelines to be consistent with PO-1 language for Average Response Time. Updated language appears in bold or strikethrough text below:

In order to make a like for like comparison between Request Manager and the OSS……….. differences are calculated and reported at the close of each month. **Average Response Time is the sum of the response times divided by the number of Pre-Ordering queries in the report period.** ~~The monthly average is calculated for each transaction type by averaging all of the daily average response times.~~ Monthly results….

Rationale:

Language clarification. Resolved Liberty Audit Findings MD #6 and VA #6. **Consensus item from JSC meeting 12/21/04.**

PO-4	Timeliness of Change Management Notice

49. Change Proposed:

Update the Performance Standard section to specify treatment of shorter intervals for notification when Verizon and CLECs have agreed to this interval.

Updated language appears in bold/strikethrough language below.

Timeliness Standards:		
Change type	**Change Notification**: Interval between notification and implementation	**Change Confirmation**: Final Documentation Availability before implementation[1]
Type 5 – CLEC originated	≥ 73 calendar days for business rules, ≥ 66 calendar days for technical specifications **or Verizon/CLEC agreed upon timeframes**	>= 45 calendar days **or Verizon/CLEC agreed upon timeframes**
Type 4 – Verizon originated	≥ 73 calendar days for business rules, ≥ 66 calendar days for technical specifications **or Verizon/CLEC agreed upon timeframes**	>= 45 calendar days **or Verizon/CLEC agreed upon timeframes**
Type 3 – Industry Standard	≥ 73 calendar days for business rules, ≥ 66 calendar days for technical specifications **or Verizon/CLEC agreed upon timeframes**	>= 45 calendar days **or Verizon/CLEC agreed upon timeframes**
Type 2 – Regulatory	Time periods established in Regulatory Order. If no time periods set, default to above time period.	Time periods established in Regulatory Order. If no time periods set, change notification and change confirmation is negotiated on an individual case basis through the Change Management Process.
Type 1 – Emergency Maintenance	Notification before implementation	N/A

Rationale:

Change in process to include the measurement of agreed upon shorter intervals. Resolves Liberty Audit Findings: NJ 18, VA14, and MD 14. **Consensus per the 11/23/04 JSC meeting.**

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[1] Type one (1) change confirmation is not applicable.

PO-5	Average Notification of Interface Outage

50. *Change Proposed*:

Update the Performance Standard section to more accurately measure outage notifications and the PO-5 sub-metric and numerator/denominators. Updated language appears in bold or strikethrough text below.

Performance Standard: ~~not more than 20 minutes~~ **95%**

PO-5-01 metric title: **% On Time** ~~Average~~ **Notice of Interface Outage**

Numerator: **Number of outage notifications sent where the D**~~d~~**ate** and time of outage notification to CLECs minus date and time the interface outage was identified by VZ **is less than or equal to 20 minutes.**

Denominator: Total number of interface outages**.** ~~for which notice was given~~

Rationale:

Process change to improve measurement of outage notifications. Resolves Liberty audit findings NJ 19, 21 and 23, VA 15, 17 and 18, MD 15, 17 and 18, and PA 5. **Consensus items 11/23/04 JSC meetings**